



City of Seattle
Citizens Telecommunications and Technology Advisory Board (CTTAB)

CTTAB Statement to the FCC Concerning the Local Community Radio Act

This letter was unanimously approved on May 8, 2012

Seattle's Citizens' Telecommunications and Technology Advisory Board (CTTAB), have been following the implementation of the Local Community Radio Act that passed Congress in 2010. We are excited by the opportunity it will offer our city's non-profits and community media organizations to expand their voices in our city and in our neighborhoods.

CTTAB is tasked with studying and making recommendations to the Mayor and Seattle City Council on issues of community-wide interest relating to telecommunications and technology. In addition, we encourage and promote affordable access to and use of telecommunications and technology. As part of that charter, we believe it is in our purview to encourage the full and proper implementation of the Local Community Radio Act.

We live in an urban area that has many pre-existing commercial radio stations. The Local Community Radio Act allows for low power radio stations to broadcast on a frequency that is three stations (0.6 Mhz) away from existing stations, also referred to as third-adjacent. For second-adjacent frequencies (stations that are 0.4 MHz away from the next existing station), the Radio Act allows the FCC to issue a waiver, if certain engineering practices are met.

These second-adjacent waivers will need to be required from our new low-power radio stations on many of the available frequencies. It is our understanding that, though Congress specifically granted the FCC the authority to grant these second-adjacent waivers, it is up for debate as to whether you will utilize this authority.

We urge you to exercise your authority and issue these second-adjacent waivers to qualified stations, utilizing existing rules and regulations that govern granting second-adjacent waivers. If you do not allow low power stations to receive these second-adjacent waivers, or impose unnecessarily stringent engineering guidelines for the attaining the waivers, the expansion of community radio will be significantly curtailed in our city, a result that is clearly at odds with the intent of the legislation passed by Congress.

Thank you for your time and consideration.